

Exhibit 1

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

BSG RESOURCES LIMITED (in
administration),

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 19-11845 (SHL)

**PROPOSED ORDER GRANTING MOTION OF VALE S.A. FOR LEAVE TO FILE
UNDER SEAL CERTAIN EXHIBIT TO THE LETTER OF JEFFREY A. ROSENTHAL**

Upon the motion, dated September 2, 2020 (the “Motion”)¹ of Vale S.A. (“Vale”) for entry of an order authorizing Vale to file Exhibit C to the *Letter of Jeffrey A. Rosenthal in Response to the Joint Administrators’ Letter dated August 28, 2020* [ECF No. 118] under seal; and the Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b); and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that Vale provided appropriate notice of the Motion and no other notice need be provided; and the Court having

¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. Vale is authorized to file Exhibit C under seal. Vale shall provide an electronic copy of this Order and Exhibit C to the Clerk of the Court.
3. Except upon further order of the Court, Exhibit C shall remain under seal, and shall not be made available to anyone without the consent of Vale and the Joint Administrators, except that copies of Exhibit C shall be provided to (a) the Court, and (b) any other party as may be ordered by the Court or agreed to by Vale and the Joint Administrators. Each party to whom disclosure is made shall keep Exhibit C confidential.
4. Vale is authorized to take all actions necessary to effectuate the ruling set forth in this Order.
5. Vale is authorized to seek to unseal or dispose of Exhibit C at the conclusion of the proceedings.
6. This Order is without prejudice to the rights of any party in interest, to seek to unseal Exhibit C or any part thereof.
7. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2020
New York, New York

THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE